State of California



Fair Political Practices Commission

2004 Annual Report

This condensed annual report was originally published as an article in the March 2005 FPPC Bulletin.

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The State Seal outside the Commission hearing room in Sacramento

"There is hereby established in state government the Fair Political Practices Commission. The Commission shall have five members, including the chairman. No more than three members of the Commission shall be members of the same political party."

From the Political
 Reform Act of 1974

Our 30th Year of Service

FPPC's 2004 Achievements Include Major Enforcement, Education, Litigation and Regulatory Actions

The Fair Political Practices Commission, created by the people through a 1974 ballot initiative, began operation in 1975 and marked its 30th year of service to Californians in 2004.

As it began three decades ago, the Commission remains a non-partisan panel of five members that is responsible for administering and enforcing the Political Reform Act's rules on conflicts of interest, campaign contributions and expenditures and lobbying disclosure.

Our regulated community includes tens of thousands of state and local government officials and designated employees, as well as state and local candidates, campaign committees and major donors and lobbyists.

The mission statement of the FPPC declares that the agency promotes "the integrity of representative state and local government in California through fair, impartial interpretation and enforcement of political campaign, lobbying, and conflict of interest laws."

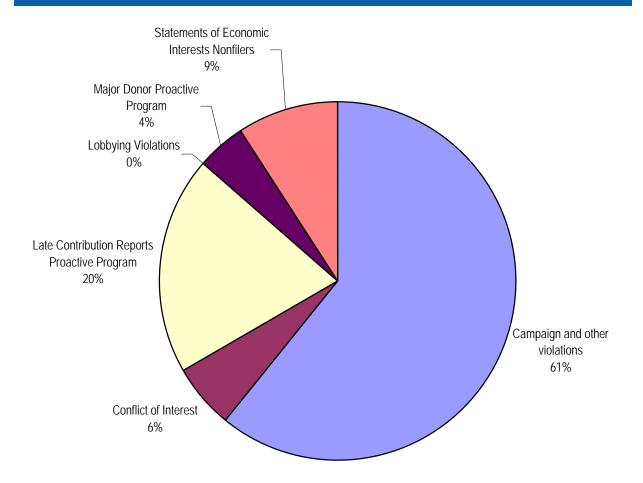
In the early years, Commission communications to regulated persons and the public were primarily conducted through the post office, telephone and public meetings. Today, our monthly public Commission meetings remain the heart of our activity, but we also use our extensive website and automatic e-mail systems to more efficiently get the word out about our proposals, actions and projects.

Despite resource limitations and heavy caseloads in its regular programs, the Commission launched or continued a variety of major new initiatives in 2004. These included:

- A proposed pilot project intended to consolidate California's conflict-of-interest laws
- The approval and publication of new guidelines for filing officers of Statements of Economic Interests

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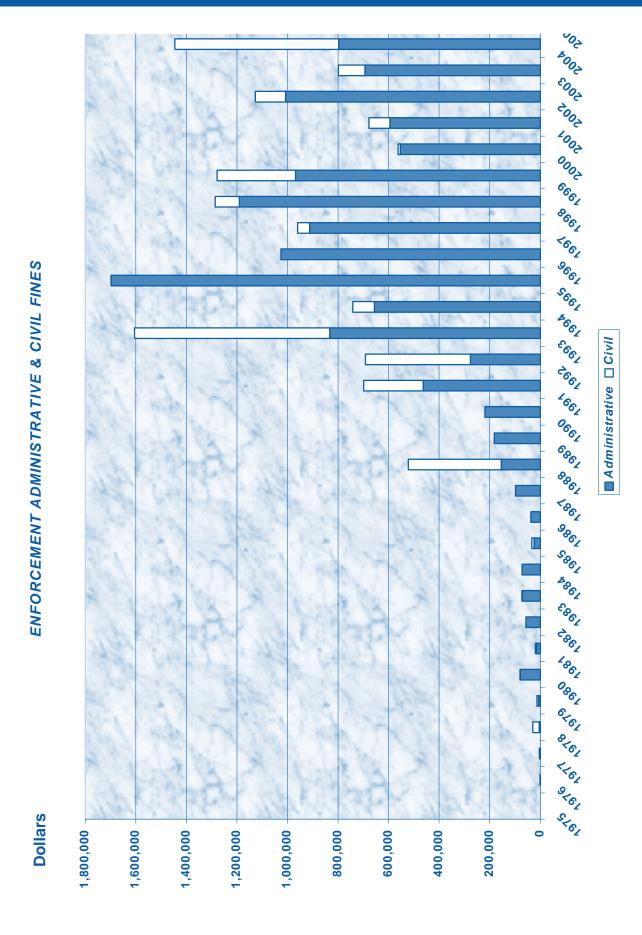
2004 Total Administrative and Civil Fines—\$1,445,562 Fines By Type of Violation



Administrative and Civil Settlements—2004 *

TYPE OF VIOLATION:	Fines	No. of Cases	Case %	Fine %
Campaign and other violations	\$879,150	37	22%	61%
Conflict of Interest	\$84,000	5	3%	6%
Late Contribution Reports Proactive Program	\$285,337	46	27%	20%
Lobbying Violations	\$0	0	0%	0%
Major Donor Proactive Program	\$63,025	27	15%	4%
Statements of Economic Interests Nonfilers	\$134,050	53	32%	9%
Total	<i>\$1,445,562</i>	168	100%	100%

^{*}Some figures are rounded to the nearest whole dollar or percentage point.



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 A new regulation that applies state candidate contribution limits to state candidatecontrolled ballot measure committees

- Continued improvements to our website and e-mail systems
- A continued commitment to seek more input and feedback from the regulated community and the public in the formative stages of our rulemaking process
- Adoption of newly amended regulations to provide clearer guidance to those committees using electronic methods to make and receive contributions
- Major litigation defending the Political Reform Act
- A discussion of the challenges of regulating Internet political campaigning
- Revision of the FPPC's Campaign Disclosure Manuals and other key publications

The FPPC is one of the smaller state agencies and has its office and headquarters in Sacramento at 428 J Street. We have a staff of approximately 60 employees and had a 2004-05 fiscal year budget of approximately \$6.1 million. The chair of the Commission serves full time

The Commission's Budget

Although it has extensive statewide responsibilities, the FPPC is one of the smaller state agencies in terms of both its budget and number of authorized staff positions. The total budget appropriation for fiscal year 2004-2005 was \$6.1 million. Five years earlier, in fiscal year 2000-2001, the budget was \$6.6 million, or \$500,000 more than in fiscal year 2004-2005. Administrative and civil fines collected by the FPPC are not retained by the Commission but are forwarded to the state's General Fund.

and is salaried, while the four other commissioners serve part time and receive a modest stipend for each monthly meeting.

The Commission had over 225 agenda items before it during its 2004 meetings, requiring extensive preparations and review of documents by the commissioners prior to each meeting.

The following are some of the major highlights of the FPPC's work in 2004:

Enforcing the law

The FPPC's Enforcement Division had an extremely busy year and opened 839 enforcement case files. The division completed prosecution of 168 cases during the year. The Commission assessed \$1,445,562 in administrative and civil fines in 2004, compared to \$798,734 in 2003 (please see the charts accompanying this article for details).

Of these cases in 2004, 32 percent stemmed from our Statement of Economic Interests Nonfilers Proactive (streamlined) Program, 27 percent from our Late Contribution Reports Proactive (streamlined) Program, 22 percent from campaign and other violations, 15 percent from our Major Donor Proactive (streamlined) Program, and 3 percent from conflict-of-interest violations.

The special proactive programs used by the Enforcement Division result in expedited prosecutions and more timely public disclosure. The division strives to educate and alert respondents with the goal of preventing additional violations of the Political Reform Act in the future.

During 2004, the Commission approved changes to the streamlined enforcement program for Statement of Economic Interests Non-Filers. The changes incorporated the use of one-page stipulation documents similar to those used in the other streamlined enforcement programs, and modified the schedule of penalties imposed under the program

The 2004 fines brought the cumulative total of FPPC fines to \$15,951,310, combined administrative and civil, since the agency began operation in 1975. (This total does not include \$89,450 in assessed fines that were waived by the Commission in 1976 and during the 1980s.)

While the vast majority of enforcement cases

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FPPC Enforcement Actions Summary of Fines Assessed and Imposed 1975 through 2004

		Administrative Actions		Civil Judgments		Total Fines	
Year	Cases	Fines Assessed	Fines Imposed	Cases	Fines Assessed	By Year	
1975	0	\$0	\$0	0	\$0	\$0	
1976	11	\$1,400	\$900*	0	\$0	\$900	
1977	1	\$4,000	\$4,000	0	\$0	\$4,000	
1978	1	\$4,500	\$4,500	2	\$25,250	\$29,750	
1979	8	\$6,820	\$6,820	2	\$6,500	\$13,320	
1980	18	\$79,600	\$43,650*	1	\$1,000	\$44,650	
1981	5	\$14,600	\$11,600*	2	\$5,000	\$16,600	
1982	10	\$57,500	\$46,750*	0	\$0	\$46,750	
1983	5	\$71,100	\$58,600*	1	\$1,250	\$59,850	
1984	15	\$72,200	\$68,200*	0	\$0	\$68,200	
1985	7	\$24,750	\$19,750*	1	\$9,000	\$28,750	
1986	12	\$37,400	\$36,150*	0	\$0	\$36,150	
1987	22	\$97,900	\$91,900*	0	\$0	\$91,900	
1988	34	\$154,600	\$144,100*	3	\$367,500	\$511,600	
1989	35	\$182,250	\$182,250	0	\$0	\$182,250	
1990	36	\$219,000	\$219,000	0	\$0	\$219,000	
1991	39	\$463,550	\$463,550	3	\$235,000	\$698,550	
1992	44	\$276,450	\$276,450	3	\$415,000	\$691,450	
1993	36	\$833,050	\$833,050	1	\$772,000	\$1,605,050	
1994	30	\$656,800	\$656,800	1	\$85,000	\$741,800	
1995	51	\$1,698,050	\$1,698,050	0	\$0	\$1,698,050	
1996	56	\$1,026,221	\$1,026,221	0	\$0	\$1,026,221	
1997	54	\$912,650	\$912,650	2	\$47,000	\$959,650	
1998	96	\$1,190,710	\$1,190,710	7	\$95,490	\$1,286,200	
1999	63	\$968,500	\$968,500	5	\$309,900	\$1,278,400	
2000	174	\$554,037	\$554,037	1	\$9,100	\$563,137	
2001	158	\$595,000	\$595,000	2	\$83,000	\$678,000	
2002	143	\$1,007,836	\$1,007,836	4	\$119,000	\$1,126,836	
2003	256	\$693,734	\$693,734	2	\$105,000	\$798,734	
2004	162	\$797,562	\$797,562	6	\$648,000	\$1,445,562	
Totals	1,420	\$12,701,769	\$12,612,320	43	\$3,338,990	\$15,951,310	

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are resolved through stipulated settlement agreements, the FPPC also is empowered to take enforcement cases before the civil courts. Attorneys and other staff from the Legal Division and Enforcement Division, in some cases with the assistance of outside counsel, devote much of their time to these cases.

Developments in major civil cases ongoing in 2004 included:

- The 3rd District Court of Appeal in Sacramento upheld the right of the FPPC to sue the Agua Caliente Band of Cahuilla Indians for failing to disclose the tribe's contributions to political campaigns and its lobbying activities.
- ◆ The 3rd District Court of Appeal in Sacramento affirmed a Sacramento Superior Court ruling which denied a motion to dismiss a lawsuit filed by the FPPC against the American Civil Rights Coalition (ACRC) and its CEO, Ward Connerly, for violating campaign disclosure laws in the unsuccessful campaign for passage of Proposition 54 in the Nov. 7, 2003, special election.
- The 3rd District Court of Appeal upheld the right of the FPPC to sue the Santa Rosa Indian Community for violations of campaign disclosure provisions of the Political Reform Act. The threejudge appellate court panel ruled 2-1 to reverse an earlier Superior Court decision that had granted a motion by the tribe to dismiss the suit.

The cases are continuing. In 2004, the FPPC also was able to obtain civil court settlements in several other major enforcement cases.

During 2004, Enforcement Division staff members also participated in training sessions for district attorneys and other outside law enforcement officials, seminars of the Council on Governmental Ethics Laws and other events.

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The FPPC: Who we are

The Fair Political Practices Commission was created by the Political Reform Act of 1974, a ballot initiative passed by California voters as Proposition 9.

The Commission is a bipartisan, independent body of five members that administers and enforces the Political Reform Act's rules on conflicts of interest, campaign contributions and expenditures and lobbying disclosure.

The Commission educates the public and public officials on the requirements of the Act. It provides written and oral advice to public agencies and officials; conducts seminars and training sessions; develops forms, manuals, instructions and educational materials; and receives and files economic interests statements from many state and local officials.

The Commission investigates alleged violations of the Political Reform Act, imposes penalties when appropriate and assists state and local agencies in developing and enforcing conflict-of-interest codes.

The Governor appoints two commissioners, including the chairman. The Secretary of State, the Attorney General and the State Controller each appoint one commissioner. Commissioners serve a single, four-year term, and no more than three members can be registered with the same political party. The chairman is salaried and serves full-time, and the other four members serve part-time.

The Commission generally meets once each month to hear public testimony, issue opinions, adopt regulations, order penalties for violations of the Act and take other action.

Supporting the Commission is a staff of 60 employees. The Commission has four main divisions — Enforcement, Technical Assistance, Legal and Administration, as well as a small executive staff and a Public Education Unit.

The Commission is headquartered at 428 J Street in downtown Sacramento. The public reception area is in Suite 620.

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BUILDING

FAIR POLITICAL PRACTICES COMMISSION

VOL. 1, NO. 1

1100 K STREET, SACRAMENTO, CA 95814

AUGUST 18, 1975

TO INTERESTED PERSONS

REPORT FROM MICHAEL BENNETT, EXECUTIVE DIRECTOR

Our new format for distributing preliminary agendas and other information about the Fair Political Practices Commission is inaugurated with this first edition of the FPPC Bulletin.

In addition to the preliminary agenda for the Commission's September 3 and 4 meeting in Sacramento, the *Bulletin* also contains information about the Commissioners, the technical assistance program, and an order coupon.

A brief description of regulation and opinion drafts and other materials to be considered at the meeting are listed in the agenda. More detailed information, including complete opinion and regulation drafts may be obtained simply by checking the appropriate items on the order coupon and returning it to the Commission.

The Commission is planning to hold a one-day public hearing in Los Angeles on Thursday, September 18 to receive general testimony related to the development of conflict-of-interest codes which all State and local agencies are obligated to adopt. The Commission's Conflict-of-Interest Division is now staffed and will be working closely with affected agencies.

The Commission staff is scheduled to move into its permanent Sacramento offices on Monday, August 25. The new address is 1100 K Street, 95814. Our mailing address remains the same: P. O. Box 807, Sacramento 95804.

The front page of the first *FPPC Bulletin*, published August 18, 1975. Today, the *Bulletin* is published via e-mail, and our website and automatic e-mail systems have largely replaced order coupons for Commission documents and heavy envelopes. Our headquarters is now at 428 J Street in Sacramento.

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Informing the public and regulated community

While one of the key duties of the FPPC is enforcing the Political Reform Act, the Commission also places much of its emphasis on educating and advising the regulated community so as to prevent and avoid future violations.

FPPC staff members answered thousands of calls for telephone advice from members of the regulated community. The FPPC saw its very popular toll-free advice line—1-866-ASK-FPPC—complete its fourth full year of operation in 2004.

On all lines coming into the FPPC in 2004, including our toll-free line, our Technical Assistance Division staff members answered 50,629 calls seeking advice, guidance and other assistance.

Here are some interesting facts about the calls we received:

- By far the busiest hour of the day was from 9 a.m. -10 a.m.
- The busiest day of 2004 was April 1, with 435 calls made to the FPPC (veteran staff members believe this was a record).
- The busiest month of 2004 was October, with 6.481 calls.
- The slowest month was May, with 2,560 calls.
- Generally, the number of daily calls ranged between 120 and 150.

Callers asked a broad variety of questions, including how to comply with the Political Reform Act's rules governing campaign contributions and expenditures, how to avoid conflicts of interest, how to complete Statements of Economic Interests (Form 700s), and how to comply with lobbying disclosure requirements.

On the more complicated advice issues, the FPPC wrote 276 letters of advice to those with obligations or duties under the Political Reform Act. The Legal Division and Technical Assistance Division held regularly scheduled joint internal advice meetings on the more complex



FPPC Staff Services Analysts Emily Bowden, left, and Cyndi Glaser are among our staff members who each year receive, check, log and file thousands of Statements of Economic Interests from government officials and designated employees.

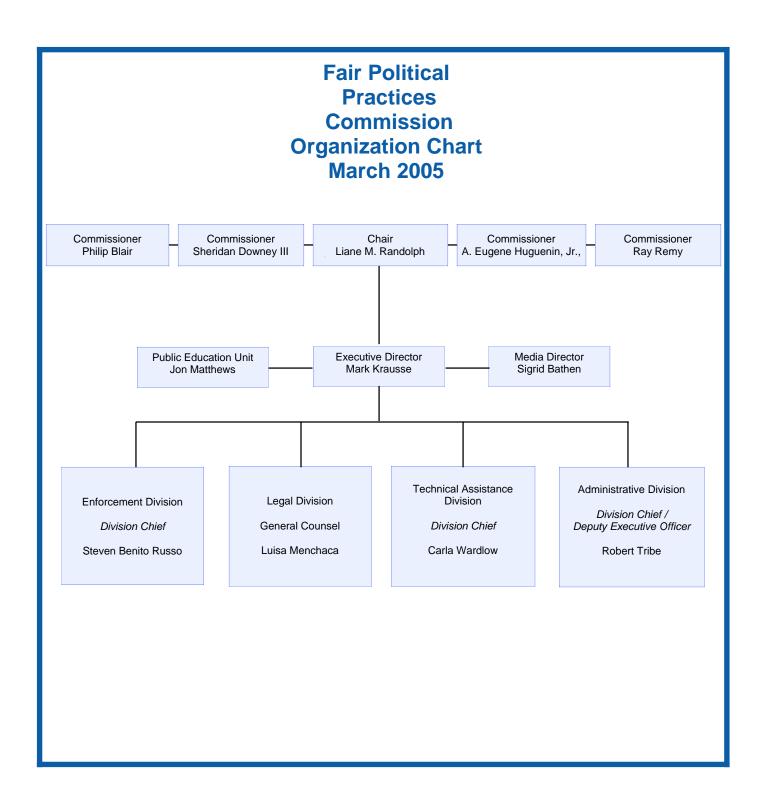
issues pertaining to advice.

The FPPC's Technical Assistance Division offered numerous in-person seminars on a varietv of subjects. Held at FPPC headquarters in Sacramento and in various other communities and agency offices, these seminars provided an informal overview of Political Reform Act obligations. Staff members offered PowerPoint presentations, informal discussions, and lengthy opportunities for questions and answers. Unfortunately, budget reductions have affected the ability of our staff members to travel. In some cases, other agencies and local governments have helped finance travel expenses for seminars requiring longer trips from Sacramento, and the FPPC greatly appreciates the assistance. Seminars in 2004 included:

- Thirteen candidate/treasurer seminars in locations ranging from Berkeley to San Diego, with a total attendance of approximately 500 persons
- Seven seminars for Statement of Economic Interests filing officers, with attendance averaging at least 25 attendees per session
- Seven seminars for specific agencies and their Statement of Economic Interests filers, with attendance averaging at least 25 per

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session

 Seven seminars for local agencies on how to amend their conflict-of-interest code, with a total attendance of about 130

- Addresses to two city clerk meetings in Fresno and San Diego
- Four campaign filing officer workshops
- Seven Statement of Economic Interests outreach visits
- ♦ Five campaign disclosure outreach visits
- Assistance at lobbyist ethics training sessions

Other Commission staff, including those from Executive, the Legal Division, the Enforcement Division and the Public Education Unit, also participated in many outreach and educational activities. Groups and organizations addressed by FPPC staff included the California Council on School Attorneys, the state Assembly Fellows. Compton Community College, the California Association of Public Retirement Systems (CALAPRS) attorneys' roundtable, the San Francisco Ethics Commission, the California Broadcasters' Association, the California Political Attornevs Association, the California Political Treasurers Association, the County of San Diego, the City Attorneys' Continuing Education Program of the California League of Cities and the California Association of Sanitation Agencies.

The FPPC was an active participant in the 26th annual conference of the Council On Governmental Ethics Laws (COGEL), held December 5-8 in San Francisco. COGEL is an international organization of government agencies, organizations, and individuals with responsibilities or interests in governmental ethics, elections, campaign finance, lobby laws and freedom of information.

FPPC Commission members and staff helped plan the COGEL event, served as committee members, and moderated or served as panelists for a variety of sessions, including seminars on pre-election enforcement actions; tribal sovereignty issues; the enforcement of ethics, campaign finance and lobbying laws and media relations.

In another major project, at its December 9 meeting the Commission adopted guidelines for

Statement of Economic Interests filing officers. The guidelines, published on our website, provide a suggested timeline for notifications to individuals who must file an annual Statement of Economic Interests.

The FPPC produced or revised a number of publications during 2004. Two new campaign disclosure manuals, developed during 2003, were given final approval by the Commission at its January 2004 meeting and thereafter published on the FPPC's website. The new manuals include information on candidates' and committees' record keeping requirements, definitions important to campaigns, reporting obligations and restrictions and prohibitions.

Numerous FPPC forms and accompanying instructions also were revised in 2004 to conform with changes to the Political Reform Act and to simplify compliance.

Other new or revised publications included a 2004 Addendum to FPPC Campaign Disclosure Information Manuals C - E, the 2004 version of the Political Reform Act of 1974, an updated fact sheet on Committee Termination Requirements for State Candidates and Officeholders, a new fact sheet on Important Changes in Campaign Reporting Rules and four issues of our newsletter, the FPPC *Bulletin*. The e-mail subscription list for the *Bulletin* grew to over 1,000 persons during 2004.

The FPPC's media director, assisted by the executive fellow and other staff, responded to hundreds of inquiries from journalists from newspapers, radio and television broadcast networks and stations, magazines, web-based publications, newsletters and the foreign press. Assistance provided by the agency included copies of Statements of Economic Interests and other public records, in-depth interviews, telephone assistance and publication of numerous press releases and press advisories. The office produced over 35 news releases or news advisories during the year.

With the assistance of all divisions, the Public Education Unit coordinated the FPPC's website, published the FPPC *Bulletin* and other educational publications, provided a dial-in broadcast of Commission meetings and offered other services.

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Interpreting the law

The Commission issued two new formal opinions during 2004:

In re Roberts, 17 FPPC Ops. 9, O-04-093.

The Commission adopted an opinion concluding that the term "spouse," for purposes of the Political Reform Act, should include domestic partners. A new law amending the Family Code, which took effect January 1, 2005, prompted analysis of the issue. The specific opinion request pertained to the application of the disqualification provisions of the Act in a domestic partnership situation. The Commission subsequently adopted a regulation addressing this issue.

In re Taylor, 17 FPPC Ops. 1, O-04-103

An unsuccessful candidate for Governor in the March, 2004, statewide special election requested an exemption from the requirement that he identify on his Statement of Economic Interests (Form 700) certain sources of income to his wholly owned law firm. His request was based on the unusually sensitive nature of a practice specializing in "tax controversies." The opinion concluded that in light of all the circumstances, the candidate had established sufficient cause for the exemption he sought from the disclosure requirements of Government Code section 87207(b)(2).

The Commission, assisted by the Legal Division and other staff members, also continued its interpretation and implementing of the Political Reform Act through a variety of major regulatory projects. These efforts included the adoption, amendment or

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List of 2004 Interested Persons' Meetings

November 9 (10 a.m.)

Eliminating paper copies of quarterly lobbying disclosure reports

November 9 (2 p.m.)

Review of revised forms and Instructions

August 25

Relating to the proposed incorporation of other conflictof-interest laws into the Political Reform Act

July 22

Filing officer guidelines for Statements of Economic Interests

June 17

Relating to the possible incorporation of conflict-ofinterest rules existing in other bodies of law, into the Political Reform Act

June 14

Relating to regulation 18901 - Mass Mailings Sent at Public Expense

June 14

Relating to Proposition 34, Government Code section 85307, loans and extensions of credit

May 26

Relating to regulations 18946 (Reporting and Valuation of Gifts); and 18946.4 (Tickets to Nonprofit and Political Fundraisers)

April 7

Relating to the possible incorporation of Government Code section 1090 into the Political Reform Act

March 24

Conflict of interest regulations: Standards of care

March 10

Proposal to extend the termination date of committees and allow committee reopening

February 18

Proposition 34: Sections 85303 and 85310: Candidate controlled ballot measure committees

January 13

Conflict-of-interest regulations and general plans. Proposal to merge Government Code section 1090 and other statutory and common law conflict-of-interest provisions into the Political Reform Act. Page 15 FPPC Bulletin March 2005 Volume 31, No. 1

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repeal of over 40 regulations during 2004.

Major new regulations included 18530.9, which states that the contribution limits of California Government Code sections 85301 and 85302 now apply to state candidate-controlled ballot measure committees. The regulation took effect on November 3, 2004, the day after the statewide general election. Generally, ballot measure committees controlled by state candidates are now subject to the same contribution limits as candidate committees. The rule is being challenged in court and defended by the FPPC.

On October 7, 2004, the Commission considered a staff proposal intended to consolidate conflict-of-interest laws not currently under the Commission's jurisdiction. The proposal would dedicate staff resources to the incorporation of Public Contracts Code sections 10410 and 10411 into the Political Reform Act, and the development of a pilot project to grant limited jurisdiction to the Commission over Government Code section 1090, et seq., through a three-year pilot project. The pilot project was endorsed by the League of Cities. The Commission formerly directed staff to pursue both projects legislatively. The pilot project, as proposed, would not move or amend section 1090 of the Government

Code, would run for a three-year period, would follow a process similar to the existing Commission opinion process as set forth in Commission regulations, and the Commission would need to be given sufficient additional funding to deal with the increased workload (including the educational component).

The Political Reform Act has been amended numerous times since its initial approval by voters. FPPC commissioners and staff members constantly track new legislation affecting the Act, and the Commission may take positions on bills when it deems appropriate. Those involved in tracking and analyzing bills include the executive director, executive fellow, assistant to the Commission, Commission counsel and others.

In other 2004 activity, the Commission and staff redoubled efforts to encourage participation in the FPPC's Interested Persons process.

Interested Persons' meetings in 2004 invited public comment on a wide range of rulemaking subjects including filing officer guidelines, mass mailings sent at public expense, reporting and valuation of gifts, candidate controlled ballot measure committees and the possible consolidation of certain of California's conflict-of-interest laws (see previous reference).

To further encourage participation in the Inter-

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In recent years, changes in technology have provided candidates and committees with the ability to receive contributions via credit card, debit account and other similar electronic means. In response, the regulated community has sought advice regarding the permissibility of electronic contributions and a determination of the types of records which must be maintained for these contributions. Staff has advised that electronic contributions are allowed under the Political Reform Act (the "Act") and are "received" when authorized by the contributor. However, interviews with several treasurers indicated that the regulated community follows a different time line for determining when an electronic contribution is "received." In addition, these interviews revealed that the types of records kept for electronic contributions vary within the regulated community.

In order to remedy these discrepancies, staff proposes amendments to regulations 18401 and 18421.1 which would establish recordkeeping and disclosure standards for electronic contributions. Regulation 18401, the required recordkeeping regulation, would be amended to outline which records must be retained for a contribution made through electronic means. (See Appendix A - Proposed Amendments to Regulation 18401.) Regulation 18421.1, which contains the standards for determining when a contribution is made or received, would be amended to provide a clear rule for determining when an electronic contribution has been "made" or "received."

— Excerpt from one of the Legal Division memoranda presented to the Commission in 2004

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ested Persons' process, the Public Education Unit launched a new, consolidated web page with links to meeting information and background materials, and published a new, color brochure entitled, "Voicing Your View—The FPPC welcomes public comment and participation in its Interested Persons process."

In an effort to further assess the impact of technology on the political process, the Commission

received and discussed the final recommendations of the Bipartisan California Commission on Internet Political Practices. The Internet Commission's report, which is posted on our website, provides information regarding the scope of online political activity and examines issues raised by this activity. According to the report, the Internet Commission believes that "the Internet and associated new technologies, if allowed to flourish, increasingly will be used in ways that improve the quality of campaigns and elections."

Filing and code review duties

In 2004, FPPC staff members received, logged, reviewed and filed 21,361 Statements of Economic Interests and Statements of Economic Interests amendments from public officials across California. These statements are public records and copies are made available by the Commission to the public upon request at no charge or, for larger orders, for a nominal fee.

Designated employees and officeholders at virtually all state and local agencies, as well as candidates for public office, use the FPPC "Form 700" to file these personal financial statements. The FPPC reviewed and revised the Form 700 during 2004—an annual project.

Many Statements of Economic Interests are not filed directly with the FPPC, but instead go to local or state agency filing officers or other officials. As previously noted, the FPPC published new guidelines for Statement of Economic Interests Filing Officers. FPPC staff members



Welcome To the FPPC's Web Information Page For Interested Persons' Meetings and Opportunities for Public Comment

The FPPC's new Interested Persons web page is at:

http://www.fppc.ca.gov/index.html?id=450

also assisted state, local and multi-county government agencies in the adoption, review and update of their individual conflict-of-interest codes.

Staff in the Technical Assistance Division also are responsible for reviewing conflict-of-interest codes for over 650 state and multi-county agencies. Every other year, agencies must review their conflict-of-interest code and submit changes to the FPPC. Five political reform consultants review code changes as well as assist in preparing codes for new agencies and commissions that are formed.

Administration

In 2004, the FPPC's small Administration Division provided computer and data processing support, budgeting, purchasing, printing, personnel services, public reception, mailing, document receiving and many other vital services. Information Technology personnel continued their work on the development of an internal computer network—an "intranet" — intended to improve internal employee communication and assist in project management. The division continued to assist the agency in ensuring that operations costs meet budget constraints.